

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

<b>In re:</b>  <b>HUB CITY HOME HEALTH, INC.<sup>1</sup></b>  <b>Debtors</b>	§ § § § § § §	<b>CASE NO. 24-10191-evr</b>  <b>CHAPTER 11 Subchapter V</b>  <b>(Jointly Administered)</b>
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**STIPULATION TO EXTENSION OF LEGACY CREDITORS'  
DEADLINE TO OBJECT TO DISCHARGEABILITY OF DEBT**

TO: EDUARDO V. RODRIGUEZ, UNITED STATES CHIEF BANKRUPTCY JUDGE:

Pursuant to the Court's Procedures, paragraph IV.c.  
([https://www.txs.uscourts.gov/sites/txs/files/Court\\_Procedures\\_November\\_1\\_2023.pdf](https://www.txs.uscourts.gov/sites/txs/files/Court_Procedures_November_1_2023.pdf))

**LEGACY HOME HEALTH AGENCY, INC.; LEGACY HOME CARE SERVICES, INC.  
D/B/A ALL SEASONS HOME CARE; and RESTORATIVE HEALTH SERVICES, LLC  
D/B/A COASTAL HOME HEALTH CARE** (collectively, the "Legacy Creditors"), creditors  
and parties-in-interest in the above-styled jointly administered Chapter 11 case, and the Debtors  
(together with the "Legacy Creditors") submit their *Stipulation to Extension of Legacy  
Creditors' Deadline to Object to Discharge of Dischargeability of Debt* ("Stipulation"):

**WHEREAS**, the Legacy Creditors and the Debtors have been engaged in litigation since  
May 2020;

**WHEREAS**, the Legacy Creditors' claims were scheduled as unliquidated, contingent,  
and disputed;

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<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last 4 digits of their respective Employer Identification Numbers or Social Security Numbers, are: (a) Hub City Home Health, Inc. (No. 24-10191, EIN xx-xxx4882); (b) American Medical Programs, Inc. (No. 24-10192, EIN xx-xxx4669); (c) American Medical Home Health Services-San Antonio, LLC (No. 24-10193, EIN xx-xxx8691); (d) American Medical Home Health Services, LLC (No. 24-10194, EIN xx-xxx6149); (e) American Medical Hospice Care, LLC (No. 24-10195, EIN xxxxx3017).

**WHEREAS**, the Legacy Creditors' timely filed Proofs of Claim asserting claims of at least \$27 million. *See* Proofs of Claim 14, 15, 16, 17 & 18 (as amended);

**WHEREAS**, the Debtors intend to file detailed objections to the Proofs of Claims and are presently seeking by Motion the § 502(c) Estimation of the Legacy Proofs of Claims; and

**WHEREAS**, the original deadline for parties to object to the dischargeability of their debt was **February 14, 2025**;

**WHEREAS**, the Debtors and the Legacy Creditors mediated their disputes on March 5, 2025 and have continued settlement discussions since that date;

**WHEREAS**, in furtherance of their settlement discussions, the Debtors and the Legacy Creditors have previously stipulated to extend the deadline for Legacy to object to the dischargeability of their claims;

**WHEREAS**, pursuant to the prior stipulations between the Debtors and Legacy, the current deadline for Legacy to object to the dischargeability of their claims is April 30, 2025;

**WHEREAS** the Debtors and Legacy are continuing settlement discussions and mutually desire to focus on the potential for a consensual resolution and limit the expenditure of resources on potentially unnecessary contested matters;

**NOW THEREFORE**, the Parties stipulate and agree that the deadline for the Legacy Creditors should be extended to object to the dischargeability of their claim be extended to **June 6, 2025**.

Dated this 28<sup>th</sup> day of April, 2025.

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